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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 2, 2006

Mr. Roy J. Schepens, Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

RECEIVED
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EDMC

Re: Request for a Conditional Contained-In Determination for Hanford Site Tank Farms
Clean-Out Box A-30 Soils

Reference: Letter 06-TPD-044 from R. Schepens, USDOE, to J. Hedges, Ecology, "Transmittal
of Contained-In Determination and Analysis Results for Clean-Out Box A-30 Soils,"
dated July 5, 2006

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Dear Mr. Schepens:

The Department of Ecology reviewed the above referenced request. We evaluated the information to determine if soil and associated laboratory debris from the construction activity associated with the A-30 Clean-Out Box should be managed as dangerous waste in accordance with the principles of the "contained-in" policy. Under Ecology's "contained-in" policy, contaminated media may be determined to no longer contain hazardous waste when the hazardous constituents in the media fall below site-specific, risk-based levels and the media do not exhibit a characteristic.

We understand that the submitted data are representative of the contamination in the A-30 Clean-Out Box and associated laboratory debris. It is our understanding that the soils and debris do not designate as dangerous waste under federal or state characteristics and criteria. Based on the information received, the excavated soils were contaminated by tank waste that leaked from the waste transfer lines approximately 20 years ago. The F-listed constituents of concern from the Hanford Site tank farms include:

- F001 – 1,1,1-trichloroethane
- F002 – methylene chloride
- F003 – acetone
- F004 – *o*-cresol and *p*-cresol
- F005 – methyl ethyl ketone



Mr. Roy J. Schepens
August 1, 2006
Page 2

Based on the data submitted, we determined that the concentration of hazardous constituents in the A-30 Clean-Out Box soils and associated laboratory debris samples are below Model Toxic Control Act Method B direct contact cleanup values. Additionally, the soils did not exhibit toxicity characteristics. **These levels of contamination do not warrant management of the A-30 Clean-Out Box soils and associated laboratory debris as a hazardous or dangerous waste.** Therefore, Ecology will not require CH2M HILL Hanford Group, Inc. to dispose of the soils and associated laboratory debris as a listed waste. However, because the soils and associated laboratory debris are contaminated with radioisotopes, they are to be disposed of as low-level waste at the Hanford Site burial grounds managed by Fluor Hanford, Inc.

Please note that this application of the "contained-in" policy is specific for the A-30 Clean-Out Box soils and associated laboratory debris for which data were submitted and reviewed. It does not apply to any other soils, associated debris, or analytical waste. It applies only to the contaminants of concern as they existed in the sample. Data from any additional soils and associated debris must be submitted to Ecology for a determination.

If you have any questions regarding this contained-in determination, contact Beth Rochette at (509) 372-7922.

Sincerely,



Cheryl Whalen
Cleanup Section Manager
Nuclear Waste Program

BR:lkd

cc: Catherine Louie, USDOE
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